

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

MICHAEL ABNER, et al.,

Plaintiffs,

v.

FEDERAL EXPRESS CORPORATION,
successor by merger to FEDEX GROUND
PACKAGE SYSTEM, INC.,

Defendant.

Case No. 2:24-cv-01129-RJC

**JOINT MOTION TO EXTEND BRIEFING DEADLINES ON FEDERAL EXPRESS
CORPORATION'S RULE 11 MOTION**

Plaintiffs Michael Abner, et al. and Defendant Federal Express Corporation, successor by merger to FedEx Ground Package System, Inc. (“FedEx”) respectfully request that the Court extend the deadlines for Plaintiffs to file their Opposition to FedEx’s Motion for Rule 11 Sanctions to Dismiss Plaintiffs’ First Amended Complaint (ECF No. 23), and for FedEx to file its Reply in support thereof. In support of this motion, the Parties state the following:

1. FedEx filed its Motion for Rule 11 Sanctions to Dismiss Plaintiffs’ First Amended Complaint (ECF No. 23) on December 2, 2024.

2. Per Local Rule 7(A) and the Court’s Standing Orders and Procedures Re: Civil Motion Practice, Plaintiffs’ deadline to file their Opposition to FedEx’s Motion is currently December 23, 2024.

3. FedEx’s Reply in Support of its Motion would therefore be due on December 30, 2024.

4. The Parties have met and conferred, and, in light of the upcoming holidays and the Parties’ respective schedules, including FedEx’s lead attorney being in trial the week of January 20th, have agreed to extend the deadline for Plaintiffs’ Opposition to January 10, 2025, and to extend the deadline for FedEx’s Reply to February 7, 2025.

For the foregoing reasons, the Parties respectfully request that the Court enter an order extending Plaintiffs’ deadline to file their Opposition to January 10, 2025, and FedEx’s deadline to file its Reply to February 7, 2025.

Dated: December 13, 2024

Respectfully submitted,

/s/ Shannon Liss-Riordan

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on December 13, 2024.

s/ Matthew Carrieri